

FILED

OCT 31 2019

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PORTIA A. LINDSEY,

Defendant.

No.

4:19CR914 HEA/NCC

INDICTMENT

The Grand Jury charges:

COUNTS 1 THROUGH 4

(Social Security Fraud)

On or about the dates listed below, within the Eastern District of Missouri, the defendant,

PORTIA A. LINDSEY,

in a matter within the jurisdiction of the United States Social Security Administration, for the purpose of obtaining something of value and for other purposes, knowingly, and with the intent to deceive, falsely represented to the State of Missouri and federally insured financial institutions, that the social security number ending in 2647 had been issued to her so defendant could obtain credit and other items of value, when in fact the social security number had not been issued by the Social Security Administration to her:

<u>COUNT</u>	<u>DATE</u>	<u>FRAUDULENT USE</u>
1	August 14, 2018	Missouri Driver's License in the name of P.A.C.
2	March 25, 2019	Missouri Driver's License in the name of P.A.C.
3	June 21, 2019	Academy Bank Account in the name of P.A.C.
4	July 12, 2019	American Eagle Account in the name of P.A.C.

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNTS 5 THROUGH 6

(Bank Fraud)

A. FINANCIAL INSTITUTIONS

1. At all times relevant to the indictment, Academy Bank and American Eagle Credit Union were financial institutions insured by the federal government through the National Credit Union Association and the Federal Deposit Insurance Corporation.

B. THE SCHEME TO DEFRAUD

2. Between on or about June 21, 2019 and August 31, 2019, within the Eastern District of Missouri, the defendant,

PORTIA A. LINDSEY,

devised a scheme and artifice to obtain moneys, funds, and assets owned by and under the custody and control of federally insured financial institutions by means of false and fraudulent pretenses and representations.

3. The scheme and artifice to defraud was in substance as follows:

- a. It was part of the scheme and artifice to defraud that the defendant opened financial accounts using the name, date of birth, and social security number of P.A.C.;
- b. It was further part of the scheme and artifice to defraud that the defendant falsified her employment when opening the financial accounts;
- c. It was further part of the scheme and artifice to defraud that the defendant produced a fraudulently obtained State of Missouri driver's license in order to verify her identity;
- d. It was further part of the scheme and artifice to defraud that the defendant induced the financial institutions to issue debit cards in the identity of P.A.C.; and,
- e. It was further part of the scheme and artifice to defraud that the defendant caused losses to the financial institutions by using the fraudulently obtained debit cards in amounts exceeding her deposits to the accounts.

C. The Financial Transactions

4. On or about the dates listed below, in the Eastern District of Missouri, the defendant,

PORTIA A. LINDSEY,

executed and attempted to execute the scheme and artifice as set forth above, in that, **PORTIA A. LINDSEY** made false statements to the federally insured financial institutions listed below and submitted fraudulently obtained identification documents in order to open financial accounts and obtain debit cards:

<u>COUNT</u>	<u>DATE</u>	<u>FINANCIAL INSTITUTION</u>	<u>DEBIT TRANSACTIONS</u>
5	June 21, 2019	Academy Bank	\$2,063.88
6	July 12, 2019	American Eagle Credit Union	\$10,989.84

All in violation of Title 18, United States Code, Section 1344.

COUNT 7

(Aggravated Identity Theft)

On or about July 12, 2019, in the Eastern District of Missouri, the defendant,

PORTIA A. LINDSEY,

did knowingly possess, transfer, and use, without lawful authority, a means of identification, that being, the name, social security number, and date of birth of P.A.C., during and in relation to the commission of the felony offenses of: bank fraud, Title 18, United States Code, Section 1344; access device fraud, Title 18, United States Code, Section 1029(a)(2); and, production of an identification device, Title 18, United States Code, Section 1028(a)(1).

In violation of Title 18, United States Code, Section 1028A.

COUNT 8

(Identity Theft)

On or about August 24, 2019, within the Eastern District of Missouri, the defendant,

PORTIA A. LINDSEY,

in a matter affecting interstate commerce, knowingly transferred, possessed, and used, without lawful authority, the means of identification of another, that being the name, account number, and driver's license number of P.A.C., with the intent to commit, and in connection to the crimes of: forgery, in violation of Missouri Revised Statutes 570.090, and stealing, in violation of Missouri Revised Statutes 570.030.

In violation of Title 18, United States Code, Section 1028(a)(7).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

TRACY LYNN BERRY - 014753 TN
Assistant United States Attorney